

JOE HILL
HILL LAW OFFICES
P.O. Box 500917
Saipan, MP 96950
Tel.: (670) 234-7743/6806
Fax: (670) 234-7753
E-mail: vesta@pticom.com

*Attorney for Plaintiffs Abu Yousuf
and Md. Rokonnurzzaman*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

**ABU YOUSUF and MD.
ROKONNURZZAMAN,**

Plaintiffs,

vs.

**LONGFENG CORPORATION
dba/aka NEW XO MARKET and
PARTYPOKER, GUOWU LI, XU
GUIQING, FELOTEOV. RANADA
dba N.V.M. ENTERPRISES, jointly
and severally,**

Defendants.

Civil Case No. 1:21-cv-00015

**DECLARATION OF JOE HILL
IN SUPPORT OF PLAINTIFFS'
MOTION FOR ENTRY OF DEFAULT**

I, **JOE HILL**, hereby depose and say:

1. I am over the age of eighteen (18) years old, an adult person with personal knowledge of the matters set forth herein and am competent to testify as to such matters in a court of law.

2. I am the attorney for the Plaintiffs in the above-entitled matter.

JOE HILL
Attorney at Law
Hill Law Offices ~ Susupe
P.O. Box 917 ~ Saipan MP 96950 ~ (670) 234-6806/7743 ~ FAX: 234-7753 ~ email: joe.hill@saipan.com

4. Defendants, including Defendant Feloteo V. Ranada, were served with the SAC, as reflected on the Notice of Electronic Filing (copy attached).

6. Accordingly, Defendant Feloteo V. Ranada had until March 10, 2022 to file his response to the SAC.

8. Defendant Feloteo V. Ranada has failed to plead or otherwise defend within the time required and, therefore, is now in default.

9. Plaintiffs request and move that the Court enter default against Defendant Feloteo V. Ranada.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 14th day April, 2022 in Saipan, Commonwealth of the Northern Mariana Islands.

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